

1 FELICIA GALATI, ESQ.
2 Nevada Bar No. 7341
3 OLSON CANNON GORMLEY & STOBERSKI
4 9950 West Cheyenne Avenue
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7 Telephone: 702/384-4012
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9 Attorneys for Defendants
10 COUNTY OF CLARK, KIM KALLAS,
11 LISA RUIZ-LEE AND PAULA HAMMACK

12 UNITED STATES DISTRICT COURT

13 CLARK COUNTY, NEVADA

14 SUSAN HOY, as Guardian Ad Litem for J.M.
15 and I.M., minors,

16 Plaintiffs,

17 v.

18 ANDREA HERNANDEZ; WALDO
19 HERNANDEZ; LISA BROCHU; KIM
20 KALLAS; LISA RUIZ-LEE; PAULA
21 HAMMACK; DOE Individuals I-X; ROE
22 CLARK COUNTY DEPARTMENT OF
23 FAMILY SERVICES EMPLOYEES XI-XX,
24 individually and in their official capacities;
25 COUNTY OF CLARK, a political subdivision of
26 the State of Nevada; and ZOE CORPORATIONS
27 XXI-XXX,

28 Defendants.

CLARK COUNTY,

Cross-Claimant

v.

ANDREA HERNANDEZ; WALDO
HERNANDEZ; MOES 1-10; and MOE
CORPORATIONS 11-20,

Cross-Defendants

CASE NO. 2:20-CV-00103-GMN-VCF

STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(EIGHTH REQUEST)

Law Offices of
OLSON CANNON GORMLEY & STOBERSKI
A Professional Corporation
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
(702) 384-4012 Fax (702) 383-0701

1 ANDREA HERNANDEZ, WALDO
2 HERNANDEZ,

3
4 Cross-Claimants,

5 v.

6 CLARK COUNTY,

7 Cross-Defendant.

8 This Stipulation is being submitted because the parties inadvertently forgot to include the
9 close of discovery deadline in their Stipulation filed on 1/11/2022. (ECF NO. 83). Pursuant to
10 Fed R. Civ. P. 6, Fed. R. Civ. P. 26, LR IA 6-1, LR IA 6-2, LR 7-1, and LR 26-4, the parties, by
11 and through their respective counsel of record, stipulate and agree that there is good cause to
12 extend the close of discovery deadline for the reasons stated in the prior Stipulation (ECF No.
13 83) and consistent with this the Court's Order (ECF No. 84) filed on 1/12/2022 establishing the
14 new discovery deadlines except for the close of discovery, which the parties inadvertently did
15 not include.
16

17
18 **I. Pursuant to LR 26-4(d), the parties stipulate to the following proposed schedule**
19 **for completing all remaining discovery:**

20 The parties agree to extend all the relevant discovery deadlines by four weeks, as set forth
21 below:

- 22 1. Extend the Close of Discovery date from **3/10/2022 to 4/7/2022;**
23

24 ///

25 ///

26 ///

27 ///

28

2. All the other case deadlines established by this Court's Order (ECF No. 84) remain the same.

DATED this 12th day of January, 2022.

DATED this 12th day of January, 2022.

/s/Marjorie Hauf, Esq.

Marjorie Hauf, Esq.
Nevada Bar No. 8111
Cara Xidis, Esq.
Nevada Bar No. 11743
H&P Law
8950 W. Tropicana Ave, Ste. 1
Las Vegas, NV 89147
Attorneys for the Plaintiffs

/s/Felicia Galati, Esq.

Felicia Galati, Esq.
Nevada Bar No. 7341
Olson Cannon Gormley & Stoberski
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
*Attorney for Defendants, Lisa Ruiz-Lee,
Paula Hammack, Kim Kallas and County
of Clark*

DATED this 12th day of January, 2022.

DATED this 14th day of January, 2022.

/s/Jonathan Blum, Esq.

Jonathan Blum, Esq.
Nevada Bar No. 9515
Wiley Peterson Law Offices
1050 Indigo Dr. Suite 200B
Las Vegas, NV 89145
Attorney for Defendant, Lisa Brochu

/s/Julie Funai, Esq.

Julie Funai, Esq.
Nevada Bar No. 8725
Keating Law Group
9130 W. Russell Road, Suite 200
Las Vegas, Nevada 89148
*Attorneys for Defendants,
Andrea Hernandez and Waldo Hernandez*

ORDER

IT IS SO ORDERED



UNITED STATES MAGISTRATE JUDGE

DATED: 1-18-2022

Karla Livingston

From: jblum@wileypetersenlaw.com
Sent: Wednesday, January 12, 2022 3:26 PM
To: Felicia Galati; 'Marjorie Hauf'; 'Cara Xidis'; 'Julie Funai'
Cc: Karla Livingston; cpascal@wileypetersenlaw.com
Subject: RE: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

You may sign for me.

Jonathan D. Blum, Esq.



1050 Indigo Drive, Suite 200B
Las Vegas, Nevada 89145
Office 702.910.3329 | Mobile 702.443.0677
jblum@wileypetersenlaw.com
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From: Felicia Galati <fgalati@ocgas.com>
Sent: Wednesday, January 12, 2022 2:39 PM
To: Marjorie Hauf <Mhauf@CourtRoomProven.com>; Cara Xidis <Cxidis@CourtRoomProven.com>; jblum@wileypetersenlaw.com; Julie Funai <jfunai@keatinglg.com>
Cc: Karla Livingston <klivingston@ocgas.com>
Subject: FW: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

Sorry, all, but we forgot to include the close of discovery deadline in the Stipulation (ECF No. 83). Attached is a stipulation to address that date alone. Please advise if we have your authority to e-sign the attached. Thank you.

Felicia Galati, Esq., Shareholder
Olson Cannon Gormley & Stoberski
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
PH: 702-384-4012
FX: 702-383-0701

Karla Livingston

From: Marjorie Hauf <Mhauf@CourtRoomProven.com>
Sent: Wednesday, January 12, 2022 7:34 PM
To: jblum@wileypetersenlaw.com; Felicia Galati; Cara Xidis; 'Julie Funai'
Cc: Karla Livingston; cpascal@wileypetersenlaw.com
Subject: RE: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

Me as well

From: jblum@wileypetersenlaw.com <jblum@wileypetersenlaw.com>
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To: 'Felicia Galati' <fgalati@ocgas.com>; Marjorie Hauf <Mhauf@CourtRoomProven.com>; Cara Xidis <Cxidis@CourtRoomProven.com>; 'Julie Funai' <jfunai@keatinglg.com>
Cc: 'Karla Livingston' <klivingston@ocgas.com>; cpascal@wileypetersenlaw.com
Subject: RE: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

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Cc: Karla Livingston <klivingston@ocgas.com>
Subject: FW: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

Karla Livingston

From: Julie Funai <jfunai@keatinglg.com>
Sent: Friday, January 14, 2022 11:58 AM
To: Felicia Galati; Marjorie Hauf
Cc: jblum@wileypetersenlaw.com; Cara Xidis; Karla Livingston;
cpascal@wileypetersenlaw.com; Anna Agustin
Subject: RE: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

Permission to esign.

From: Felicia Galati <fgalati@ocgas.com>
Sent: Thursday, January 13, 2022 1:26 PM
To: Marjorie Hauf <Mhauf@courtroomproven.com>
Cc: jblum@wileypetersenlaw.com; Cara Xidis <Cxidis@courtroomproven.com>; Julie Funai <jfunai@keatinglg.com>;
Karla Livingston <klivingston@ocgas.com>; cpascal@wileypetersenlaw.com
Subject: Re: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

Julie,

Please advise. Thank you.

Sent from my iPhone

On Jan 12, 2022, at 7:34 PM, Marjorie Hauf <Mhauf@courtroomproven.com> wrote:

Me as well

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